

T T M A

DOT/RSPA/CHMS  
DOCKETS UNIT

95 SEP 20 PM 5:20

DOT/RSPA/CHMS  
DOCKETS UNIT

# Tank Conference

TRUCK TRAILER MANUFACTURERS ASSOCIATION  
1020 Princess Street - - - - Alexandria, Virginia 22314

RICHARD P. BOWLING  
PRESIDENT

RSPA - 1995-12675-1  
(703) 549-3010  
FAX: 1-703-549-3014  
September 14, 1995

Dr. Dharmendra K. Sharma  
Administrator  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Subject: Petition to Add ASTM A 622 to the List of  
Approved Steels in 178.345-2(a)(1)

Dear Dr. Sharma:

We petition for a revision of 178.345-2(a)(1) as follows where underlining indicates an addition.

§178.345-2 Material and material thickness.

(a) All material for shell, heads, bulkheads, and baffles must conform to section II, parts A and B, of the ASME Code except as follows:

(1) The following steels are also authorized for cargo tanks  
"constructed in accordance with the ASME Code."

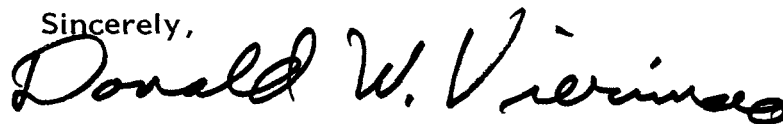
ASTM A 569  
ASTM A 570  
ASTM A 572  
ASTM A 607  
ASTM A 656  
ASTM A 622  
ASTM A 715

\* \* \*

ASTM A 622 is a low carbon hot rolled steel with an average tensile strength of 51,000 pounds and average yield strength of 37,000 pounds compared to A 569 steel with an average tensile strength of 53,000 pounds and yield strength of 41,000 pounds based on four tests.

Brownie Tank Manufacturing Company has used this steel for twenty years for tank heads. A 622 steel has the advantage that it does not wrinkle and split as A 569 steel does when deep draw forming. Brownie Tank is presently building DOT 406 cargo tank heads with A 622 steel under exemption DOT-E 11499 with an expiration date of September 30, 1995.

Sincerely,

A handwritten signature in black ink, reading "Donald W. Vierimaa". The signature is written in a cursive, flowing style.

Donald W. Vierimaa  
Vice President-Engineering

DWV/mm

cc: RSPA Docket  
TTMA Tank Conference Engineering Committee